

### **REMARKS**

This is a response to the Final Office Action dated September 10, 2009. Claims 6-8 and 13-25 are pending. Claims 6-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pub. No. 2002/0026297 ("Leymann"). Claims 13-17 and 22-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Leymann in view of U.S. Pat. No. 6,678,716 ("Pronsati").

The rejections from the Office Action dated September 10, 2009 are discussed below. No new matter has been added. Reconsideration of the application is respectfully requested in light of the above amendments and the following remarks.

#### **I. REJECTIONS UNDER 35 U.S.C. § 103(a)**

##### **A. Claims 6-8**

Independent claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Leymann. Leymann generally relates to "automatically deriving ... a taxonomy scheme of application services." Leymann, ¶11. In Leymann a taxonomy scheme consists of "preexisting categories, sometimes called topics or themes," where each theme can be assigned "access references," such as URLs, which provide access to application services when selected. Leymann, ¶72, ¶84. Thus, Leymann discloses a taxonomy comprised of two items: categories, which are topics or themes (and do not include URLs or links), and access references (URLs), which provide access to an external application service. However, Leymann fails to disclose "a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each third level document representing a task objects instantiating a single task object of singular granularity," as recited in independent claim 6. Since the taxonomy in Leymann only comprises two items, only one of which includes links (which are links to an external application service), Leymann fails to disclose: 1) a three level hierarchy including 2) distinct items on each of the three levels (set of taxonomies, activity objects, task objects), where, 3) two of the levels include links, and 4) the links of each level link

to the next lower level, not to an external application service. While Leymann discloses “subprocess models” which result in a “cross reference” to an application service already included in the taxonomy, the “cross reference” does not link to a next lower level in a hierarchy. Leymann, ¶88.

Leymann discloses “[c]ompanies ...offer their application services on the web and allow requesters to invoke those services directly; they are becoming Service Providers.” Leymann, ¶9. Leymann further discloses “service requesters will search ... to ‘Find’ a reference to an appropriate application service, which finally will be exploited for accessing that particular application service by ‘Binding’ to the service provider.” Leymann, ¶9. Thus, in Leymann, the services, and any documents related to the services, would be stored on each individual service provider providing the service, and each individual service would be accessed by the service requesters through the access references. Accordingly, Leymann fails to disclose “publishing onto an application server ... a plurality of documents having a hierarchical linkage,” as recited in independent claim 6. Since any documents in Leymann would be stored on the individual application servers, there is not a plurality of documents having a hierarchical linkage published on any one application server in Leymann. Also, since Leymann only mentions “access references” to the application services, the system in Leymann could only disclose a hierarchical arrangement of these access references, and therefore fails to disclose a hierarchical arrangement of documents themselves.

Furthermore, Leymann discloses an “automatic method of generating taxonomies” which is meant to solve “difficulties” of a “manual approach.” Leymann, ¶9. Thus, the system in Leymann is designed to run without user input and therefore fails to disclose any mechanism for displaying a plurality of documents to a user or any mechanism for receiving input from a user. Thus, Leymann fails to disclose “access by a user through an electronic display,” “receiving from the user, through the electronic display,” and “a selection of a set of taxonomies from the user,” as recited in independent claim 6.

For at least the aforementioned reasons, independent claim 6, and claims 7-8 that depend thereon, are not anticipated by Leymann. Accordingly, Applicants

respectfully request that the Examiner withdraw this rejection of claims 6-8 in light of the above remarks.

**B. Claims 13-17 and 22-25**

Dependent claims 13-17 and 22-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Leymann in view of Pronsati. As mentioned above, Leymann fails to disclose most, if not all, of the elements of independent claim 6. Pronsati fails to fill the gaps. Pronsati generally relates to a “process management system” which “includes task information indicative of tasks that define process steps.” Pronsati, col. 2, ll. 36-38. Pronsati discloses, “a hierarchical tree arrangement of tasks,” the tasks being information “defined by the task information 21.” Pronsati, col. 4, ll. 47-51. Thus, Pronsati discloses a hierarchy comprised of one item, tasks, and the tasks are information, not links. Pronsati fails to disclose “a plurality of documents having a hierarchical linkage” where “a highest level document displays the set of taxonomies with links to a set of second level documents,” “each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents,” and “each third level document representing a task objects instantiating a single task object of singular granularity,” as recited in independent claim 6. Since the hierarchy in Pronsati only includes one item, and the item does not include links, Pronsati fails to disclose: 1) a three level hierarchy including 2) a distinct item on each of the three levels (set of taxonomies, activity objects, task objects), where, 3) two of the levels include links, and 4) the links of each level link to the next lower level.

Leymann and Pronsati, alone or in combination, fail to teach or suggest all of the elements of independent claim 6, which dependent claims 13-17 and 22-25 depend on. For at least the aforementioned reasons, independent claim 6, and dependent claims 13-17 and 22-25 which depend thereon, are not anticipated by Leymann in view of Pronsati. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection of dependent claims 13-17 and 22-25 in light of the above remarks.

**CONCLUSION**

Each of the rejections in the Office Action dated September 10, 2009 has been addressed and no new matter has been added. Applicants submit that all of the pending claims are in condition for allowance and notice to this effect is respectfully requested. The Examiner is invited to call the undersigned if it would expedite the prosecution of this application.

Respectfully submitted,

November 2, 2009  
Date

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